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8 UNITED STATES DISTRICT COURT

9 DISTRICT OF NEVADA

10 BRIAN VANDEVELDE,

11 Plaintiff,

12 vs.

13 BANK OF AMERICA, N.A.,

14 Defendants.

Case No.: 2:21-cv-01495-JAD-NJK

**JOINT MOTION TO EXTEND TIME TO
RESPOND TO COMPLAINT (FIRST
REQUEST)**

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17 Plaintiff, Brian Vandeveld (‘‘Plaintiff’’), and Defendant, Bank of America, N.A. (‘‘BANA’’), by
18 and through their respective attorneys of records, jointly move the Court as follows:

19 On August 11, 2021, Plaintiff filed his Complaint [ECF No. 1]. BANA was served with Plaintiff’s
20 Complaint on August 11, 2021. The deadline for BANA to respond to Plaintiff’s Complaint is
21 September 1, 2021. The Parties have discussed extending the deadline for BANA to respond to Plaintiff’s
22 Complaint to allow for better investigation of the allegations and discuss possible resolution of the
23 matter.

24 WHEREAS, the Parties hereby stipulate and agree to extend the deadline for BANA to file their
25 responsive pleading to Plaintiff’s Complaint to October 1, 2021.

26 This is the first motion for an extension of time for BANA to file their responsive pleading. The
27 extension is requested in good faith and is not for purposes of delay or prejudice to any other party.

28 As part of this motion, BANA agrees to participate in any Rule 26(f) conference that occurs

during the pendency of this extension.

<p>DATED this 1st day of September, 2021.</p> <p>WRIGHT, FINLAY & ZAK, LLP</p> <p><u>/s/ Ramir M. Hernandez</u> Darren T. Brenner, Esq. Nevada Bar No. 8386 Ramir M. Hernandez, Esq. Nevada Bar No. 13146 7785 W. Sahara Avenue, Suite 200 Las Vegas, Nevada 89117 Attorneys for Defendant, Bank of America, N.A.</p>	<p>DATED this 1st day of September, 2021.</p> <p>LAW OFFICES OF NICHOLAS M. WAJDA, ESQ./WAJDA LAW GROUP, APC</p> <p><u>/s/ Nicholas M. Wajda</u> Nicholas M. Wajda Nevada Bar No. 11480 871 Coronado Center Drive, Ste. 200 Henderson, Nevada 89052 Attorneys for Plaintiff, Brian Vandeveld</p>
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ORDER

IT IS SO ORDERED.

Dated September 2, 2021


UNITED STATES MAGISTRATE JUDGE